

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

§ Civil Action No. 4:20-cv-00576
§
§ The Honorable Charles R. Eskridge III
§
§ CLASS ACTION
§
§ Magistrate Judge Christina A. Bryan
§

**JOINT APPENDIX OF PRIOR BRIEFING REGARDING PLAINTIFFS'
MOTION TO COMPEL**

Pursuant to the Court’s March 19, 2024 Order (ECF 224), the Parties¹ respectfully submit this joint appendix of briefing and related documents for reference in the Court’s review of documents Defendants challenge as falling outside the scope of the privilege and work product waiver that Judge Eskridge found “with respect to the entire subject matter of the investigation conducted by the Anadarko Audit Committee” (ECF 220 at 1).

TAB	DOCUMENT	DATE FILED	ECF²
1	Plaintiffs’ letter seeking leave to file motion to compel	Feb. 22, 2022	ECF 100
2	Defendants’ letter re: leave to file motion to compel	Feb. 24, 2022	ECF 103
3	Plaintiffs’ Motion to Compel Documents Concerning Anadarko Audit Committee’s Purported Investigation	May 2, 2022	ECF 122
4	Defendants and Non-Parties Eric Mullins, Kevin Chilton and Mark McKinley’s Opposition to Plaintiffs’ Motion to Compel	May 4, 2022	ECF 124
5	Declaration of Benjamin Gruenstein in Support of Defendants and Non-Parties Eric Mullins, Kevin Chilton and Mark McKinley’s Opposition to Plaintiffs’ Motion to Compel	May 4, 2022	ECF 125
6	Plaintiffs’ Reply in Further Support of Motion to Compel Documents Concerning Anadarko Audit Committee’s Purported Investigation	May 16, 2022	ECF 127
7	Supplemental Submission Regarding Plaintiffs’ Motion to Compel Documents Concerning	Mar. 22, 2023	ECF 172

¹ The “Parties” refer to Class Representatives Norfolk County Council as Administering Authority of the Norfolk Pension Fund and Iron Workers Local #580 Joint Funds, on behalf of themselves and the Class (collectively, Plaintiffs), and defendants Anadarko Petroleum Corporation, R.A. Walker, Robert G. Gwin, Robert P Daniels, and Ernest Leyendecker III (collectively, “Defendants”).

² “ECF” refers to the docket filing entry numbers that correspond to documents filed in *In re Anadarko Petroleum Corporation Securities Litigation*, No. 4:20-cv-00576 (S.D. Tex.), and *In re Anadarko Petroleum Corporation Securities Litigation*, No. 23-20350 (5th Cir.), as applicable.

	Anadarko Audit Committee's Purported Investigation		
8	Opinion and Order Compelling Production of Documents	Mar. 31, 2023	ECF 173
9	Transcript of motion hearing held on March 17, 2023	Apr. 10, 2023	ECF 187
10	Defendants' Motion to Reconsider or, in the Alternative, Certify for Interlocutory Appeal the Court's Order Compelling Production of Investigation Documents	Apr. 27, 2023	ECF 192
11	Plaintiffs' Opposition to Defendants' Motion to Reconsider or, in the Alternative, Certify for Interlocutory Appeal the Court's Order Compelling Production of Investigation Documents	May 18, 2023	ECF 194
12	Defendants' Reply in Support of Their Motion to Reconsider or, in the Alternative, Certify for Interlocutory Appeal the Court's Order Compelling Production of Investigation Documents	May 30, 2023	ECF 195
13	Order Denying Motion for Reconsideration or for Certification for Interlocutory Appeal	June 30, 2023	ECF 199
14	Defendants-Petitioners' Petition for Writ of Mandamus	July 21, 2023	App.ECF 2-3
15	Plaintiffs' Letter to Judge Eskridge regarding Discovery Dispute	July 21, 2023	ECF 203
16	Defendants' Response to Plaintiffs' Letter	July 25, 2023	ECF 204
17	Plaintiff-Respondent's Opposition to Petition for Writ of Mandamus	Aug. 14, 2023	App.ECF 30
18	Reply in Support of Petition for Writ of Mandamus	Aug. 25, 2023	App.ECF 40
19	Order denying petition for writ of mandamus	Oct. 16, 2023	App.ECF 54
20	Defendants' letter requesting Court stay all proceedings pending resolution of Defendants' appeal	Oct. 30, 2023	ECF 210
21	Plaintiffs' response letter to Defendants' October 30, 2023 letter	Nov. 6, 2023	ECF 211
22	Minute Entry and Order	Jan. 10, 2024	ECF 216

23	Transcript of hearing held on January 10, 2024	Jan. 19, 2024	ECF 217
24	Joint Status Report	Jan. 24, 2024	ECF 219
25	Order referring review to Magistrate Judge Christina A. Bryan	Jan. 29, 2024	ECF 220

DATED: April 29, 2024

KENDALL LAW GROUP, PLLC
JOE KENDALL (Texas Bar No. 11260700)
(SDTX Bar No. 30973)
Attorney-in-charge

s/ Joe Kendall

JOE KENDALL

3811 Turtle Creek Blvd., Suite 825
Dallas, TX 75219
Telephone: 214/744-3000
214/744-3015 (fax)

Texas Local Counsel for Plaintiff

ROBBINS GELLER RUDMAN & DOWD
LLP

MARK SOLOMON

DANIEL S. DROSMAN

RACHEL L. JENSEN

LUKE O. BROOKS

HILLARY B. STAKEM

FRANCISCO J. MEJIA

MEGAN A. ROSSI

NICOLE Q. GILLILAND

655 West Broadway, Suite 1900

San Diego, CA 92101

Telephone: 619/231-1058

619/231-7423 (fax)

Class Counsel

DATED: April 29, 2024

SHIPLEY SNELL MONTGOMERY LLP
GEORGE T. SHIPLEY (TX Bar No.
18267100) (SDTX Bar No. 02118)

s/ George T. Shipley

GEORGE T. SHIPLEY

717 Texas Avenue, Suite 1800
Houston, TX 77002
Telephone: 713/652-5920
713/652-3057 (fax)

CRAVATH, SWAINE & MOORE LLP
KEVIN J. ORSINI (*pro hac vice*)
LAUREN M. ROSENBERG (*pro hac vice*)
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
Telephone: 212/474-1000
212/474-3700 (fax)

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on all counsel of record who have appeared in this matter via the Court's CM/ECF system on this, the 29th day of April, 2024.

s/ Joe Kendall

JOE KENDALL